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perform surgery, while not requiring such time of study from those contemplating the regular practice as a condition to their obtaining unlimited certificates, is held, in *State v. Gravett* (Ohio), 55 L. R. A. 791, to be void.

RIGHT OF GOVERNOR TO VETO PART OF A BILL.—Under a constitutional power to disapprove of any item or items of an appropriation bill, the executive is held, in *Com. v. Barnett* (Pa.), 55 L. R. A. 882, to have the right to disapprove one or more of the subdivisions of a clause making appropriations for schools, by which the amount is distributed among separate designated schools or educational interests, either as to the beneficiary, or as to the amount, and approve the residue.

With this case is a note as to the power to veto part only of a statute.

SPENDTHRIFT TRUSTS—AGREEMENT BETWEEN BENEFICIARY AND TRUSTEES. An agreement between the beneficiary of a spendthrift trust and the trustees by which he becomes entitled to a certain portion of the income absolutely, when by the terms of the instrument creating the trust the question whether any sum should be paid to the beneficiary, and, if so, what amount, and under what circumstances, was left to the discretion of the trustees, is held, in *Murphy v. Delano* (Me.), 55 L. R. A. 727, to be void, and not to bring the specified income within the reach of creditors. See *Hutchinson v. Maxwell*, 7 Va. Law Reg. 785, and note.

CONSTITUTIONAL LAW—REVISION OF CODE.—The power to revise, without republication, a code of civil procedure to the extent of amending over 400 sections, repealing nearly 100, adding many new ones, and changing section numbers and headings, is denied in *Lewis v. Dunne* (Cal.), 55 L. R. A. 833, where the Constitution provides that no law shall be revised or amended by reference to its title, but in such case the act revised shall be re-enacted and published at length as revised or amended.

With this case is a note reviewing the authorities on the power of the legislature to enact a code or compilation of laws or amend many or undesignated sections thereof by a single statute.

See *Brown's Case*, 91 Va. 768.

BANKS AND BANKING—NATIONAL BANKS—USURY.—Under the provisions of sections 5197, 5198 of the Revised Statutes of the United States, usurious interest, actually paid to a national bank, cannot, in action by the bank upon the debt, be applied in satisfaction of the principal. Congress having prescribed, as the penalty for taking usurious interest that the person paying the same may receive twice the amount in an action of debt, he can resort to no other form of procedure. The remedy is exclusive, and the State courts can neither add to the penalty nor apply any remedy other than that as prescribed. *Charleston Nat. Bank v. Bradford* (W. Va.), 41 S. E. 153. Citing *Driesbach v. Bank*, 104 U. S. 52; *Stevens v. Bank*, 111 U. S. 197; *Bank v. Boylen*, 26 W. Va. 554, 52 Am. Rep. 113.